

AO 91 (Rev. 01/09) Criminal Complaint

**FILED**  
UNITED STATES DISTRICT COURT  
LAS CRUCES, NEW MEXICO

## UNITED STATES DISTRICT COURT

NOV - 6 2024

for the  
District of New Mexico

MITCHELL R. ELFERS  
CLERK OF COURT

United States of America

v.

Case No: 24-1619 MJ

Alejandro MALDONADO-Flores

Defendant(s)

## CRIMINAL COMPLAINT

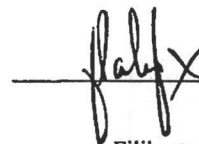
I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of November 01, 2024 in the county of Dona Ana in the State and District of New Mexico, the defendant violated 8 U.S.C. §1324(a)(1)(A)(v)(I)(Conspiracy to Violate 1324 - All subsections), an offense described as follows:

Knowingly, intentionally, and unlawfully conspired, combined, confederated and agreed with others known and unknown, to commit offenses against the United States, namely: to transport, move, and attempt to transport and move an alien within the United States by means of transportation and otherwise

This criminal complaint is based on these facts:

On November 3, 2024, Border Patrol Agents assigned to the Las Cruces, New Mexico Disrupt Unit received information from an Agent assigned to the El Paso Hardened Facility in El Paso, Texas regarding Defendant MALDONADO-Flores, Alejandro, who had been arrested for being in the United States illegally. In a Post Miranda interview, Defendant MALDONADO-Flores provided information stating he had dropped off an unaccompanied minor at a residence located in Dona Ana County, New Mexico.

☒ Continued on the attached sheet.



Complainant's signature

Filiberto Palafox, Agent

Printed name and title

by telephone, KS

Sworn to ~~before me and signed in my presence.~~

Date: November 6, 2024

City and state: Las Cruces, N.M.



Judge's signature

Kevin R. Sweazea, U.S. Magistrate Judge

Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

STATE AND DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

V.

Alejandro MALDONADO-Flores

**Continuation of Statement of Facts:**

On November 4, 2024, due to the information received from Defendant MALDONADO-Flores, Border Patrol Agents assigned to the Las Cruces Border Patrol Station Disrupt Unit conducted surveillance at a residence located in Dona Ana County, New Mexico. Agents approached the residence and knocked on the door. An individual answered the door and was questioned as to their citizenship, to which the individual admitted to being in the United States illegally. Agents informed the individual of the investigation, and the individual allowed Agents to enter the residence. Agents encountered four adults and one unaccompanied minor. Agents questioned the four adult individuals as to their citizenship to which they all admitted to being illegally present without authorization to enter or remain in the United States. All five adult individuals were placed under arrest and the unaccompanied minor were transported to the Las Cruces Station.

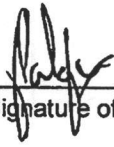
In a post Miranda interview, Defendant MALDONADO-Flores, Alejandro stated he crossed illegally into the United States near Santa Teresa, New Mexico on October 30, 2024. Defendant MALDONADO-Flores stated he was contacted by an unknown individual and was offered payment for transporting illegal aliens from El Paso, Texas to Las Cruces, New Mexico, to which he agreed. Defendant MALDONADO-Flores stated that he transported the illegal aliens that were found inside the residence in Dona Ana County, New Mexico.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

Assistant United States Attorney Randy Castellano was presented with the aforementioned facts and authorized criminal prosecution of Defendant MALDONADO-Flores, Alejandro for 8 U.S.C. 1324(a)(1)(A)(v)(I).

**Continuation of Statutory Language:**

  
\_\_\_\_\_  
Signature of Judicial Officer

  
\_\_\_\_\_  
Signature of Complainant  
Palafox, Filiberto  
\_\_\_\_\_  
Filing Agent